

Matthew C. Piccolo, Esq.
Nevada Bar No. 14331
PICCOLO LAW OFFICES
8565 S Eastern Ave Ste 150
Las Vegas, NV 89123
Tel: (702) 630-5030
matt@piccololawoffices.com

Sean A. Neahusan, Esq.
Nevada Bar No. 11224
SEAN NEAHUSAN, ATTORNEY AT LAW, L.L.C.
300 S. Arlington Ave, Suite B
Reno, NV 89501
Tel: (775) 432-1581
sean@neahusanlaw.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERICA BARROW, an individual,

Plaintiff,

vs.

HELICOPTER PARTS INTERNATIONAL,
INC, a Nevada corporation; HARRY
NIWRANSKI, an individual; ANTHONY
MAGNOTTA; DOES I through X, inclusive;
and ROE CORPORATIONS I through X,
inclusive.

Defendants.

Case No. 3:20-cv-00528-MMD-CLB

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR PLAINTIFF
TO RESPOND TO MOTION TO
DISMISS**

(First Request)

Plaintiff Erica Barrow (“Barrow”) and Defendants Helicopter Parts International, Inc. (“HPI”), Harry Niwranski (“Niwranski”), and Anthony Magnotta (“Magnotta”) (collectively, when possible, “Defendants”), by and through their respective counsel, hereby submit the following Stipulation and [Proposed] Order to Extend Deadline for Plaintiff to Respond to Motion to Dismiss.

Defendants filed two motions to dismiss the First Amended Complaint on December 2,

2020 (ECF #24, 25). The current deadline for Plaintiff's responses is December 16, 2020. Plaintiff requests a one-week extension to respond to the Special Motion to Dismiss First Amended Complaint Pursuant to NRS 41.660 (ECF #25).

This request is made in good faith to accommodate the schedule of Plaintiff's counsel, and because responses to both motions to dismiss are due on the same day. This request is not made for the purpose of delay, and will not result in any undue delay or prejudice. Accordingly, the Parties have agreed and stipulate that the deadline for Plaintiff to respond to the Special Motion to Dismiss First Amended Complaint Pursuant to NRS 41.660 (ECF #25) will be on or before December 23, 2020.

DATED this 11th day of December, 2020.

DATED this 11th day of December, 2020.

BY: /s/ Matthew C. Piccolo
 Matthew C. Piccolo, Esq.
 Nevada Bar No. 14331
 PICCOLO LAW OFFICES
 8565 S Eastern Ave Ste 150
 Las Vegas, NV 89123
 Tel: (702) 630-5030
 matt@piccololawoffices.com

Attorneys for Plaintiff

BY: /s/ Jonathan A. McGuire*
 ANTHONY L. HALL, ESQ.
 Nevada Bar No. 5977
 JONATHAN A. MCGUIRE, Esq.
 Nevada Bar No. 15280
 SIMONS HALL JOHNSTON PC
 6490 S. McCarran Blvd., Ste. F-46
 Reno, Nevada 89509
 Telephone: (775) 785-0088

Attorneys for Defendants

* With permission

IT IS SO ORDERED:

Dated: December 11, 2020.



UNITED STATES DISTRICT JUDGE